UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

CREIGHTON TAKATA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. f/k/a BIOPTIX, INC., JOHN O'ROURKE, JEFFREY MCGONEGAL, BARRY HONIG, CATHERINE DEFRANCESCO, MICHAEL BEEGHLEY, JOHN STETSON, MARK GROUSSMAN, ANDREW KAPLAN, MIKE DAI, JASON LES and ERIC SO,

Defendants.

Case No. 3:18-02293 (FLW) (TJB)

NOTICE OF MOTION TO WITHDRAW

PLEASE TAKE NOTICE that, as soon as she may be heard, Defendant Catherine DeFrancesco, by and through her counsel at Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), shall move before the Honorable Tonianne J. Bongiovanni, of the United States District Court for the District of New Jersey, for an Order for the withdrawal of Alexander P. Wentworth-Ping of Quinn Emanuel as counsel to Ms. DeFrancesco; and

PLEASE TAKE FURTHER NOTICE that a proposed Order granting the relief requested is submitted herewith.

DATED: May 22, 2020 Respectfully submitted,

By: /s/ Jaclyn Palmerson

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Attorneys for Catherine DeFrancesco

CERTIFICATE OF SERVICE

I, Jaclyn Palmerson, hereby certify that, on May 22, 2020, I electronically transmitted the following documents via the Court's CM/ECF System for filing and transmittal of Notice of Electronic Filing to the CM/ECF registrants on record in this matter.

/s/ Jaclyn Palmerson
Jaclyn Palmerson